

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

Shaheela Karim)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:13-cv-00976-LMB-IDD
)	
Deutsche Bank National Trust Company, As)	
Trustee for Morgan Stanley ABS Capital, Inc.)	
Trust 2006-WMC2, <i>et al.</i>)	
)	
Defendants.)	
_____)	

JOINT PROPOSED DISCOVERY PLAN PURSUANT TO RULE 26(f)

Pursuant to the Court's August 15, 2013 Order, Fed.R.Civ.P. 26(f) and Local Rule 26(a)(1), the parties propose the following schedule for the completion of discovery and pretrial proceedings:

1. In order to comply with the Court's discovery deadline of December 13, 2013, the parties propose as follows:
 - a. Except as modified herein, the Federal Rules of Civil Procedure and the related Local Rules shall apply.
 - b. The written discovery opened August 15, 2013 pursuant to the Court's order on that date.
 - c. Written responses to all pleadings, motions, discovery and other papers will be served via ECF or Electronic Mail.
 - d. The parties propose waiving the initial disclosures pursuant to Rule 26(a)(1).
 - e. Any documents identified in response to discovery requests shall be made available for inspection on the date that written discovery responses are due. The parties are encouraged to produce all documents in pdf. form or another electronic format. If a party elects to produce documents in hard copy form, then the producing party shall the costs for production up to 500 pages. If the documents identified for production exceed 500 pages, the requesting party shall be responsible for the costs of production as to all pages over 500 pages.
 - f. Each party will provide copies of any subpoenas issued to third parties to the opposing party when issued.

- g. Production of Electronically Stored Information – At the election of the producing party either hard copies or .pdf copies of electronically stored information shall be sufficient for the purpose of initially responding to discovery requests and initial disclosures. In the event that a party seeks to inspect the information in electronic form, the requesting party shall bear the costs of such inspection.
 - h. Plaintiff shall make her required expert disclosures pursuant to Rule 26(a)(2) and Local Rule 26(D) by 5 p.m., October 18, 2013. Defendant shall make its required expert disclosures pursuant to Rule 26(a)(2) and Local Rule 26(D) by 5 p.m., November 15, 2013. Plaintiff shall disclose any rebuttal brief by 5 p.m., November 29, 2013.
- 2. Each party may conduct up to five (5) non-party, non-expert depositions.
- 3. All discovery shall be completed by December 13, 2013. “Completed” means that interrogatories, requests for production, and requests for admission must be served at least 30 days prior to December 13, 2013, so that responses will be due on or before the completion date.
- 4. The Final Pretrial Conference will be held on December 19, 2013, at 10:00 a.m. The items that the parties are required to bring to, or file at, the Final Pretrial Conference are recited in the Court's Order dated August 15, 2013.
- 5. Objections to trial exhibits shall be filed by December 29, 2013.
- 6. All dispositive motions shall be filed on or before December 19, 2013 and shall be set for hearing as soon thereafter as the Court is able to schedule it.
- 7. At this time, neither party consents to trial of this action by a Magistrate Judge.

Dated: August 28, 2013

Respectfully submitted,

/s/ Shikha Parikh
Shikha Parikh, VSB # 80021
Paradigm Law, P.L.C.
10615 Judicial Drive, Suite 403
Fairfax, Virginia 22030
P: 703-651-6811
F: 703-563-9199
sparikh@paradigm-law.com
Counsel for Plaintiff.

/s/ Amy S. Owen
Amy S. Owen (VSB No. 27692)
Nicholas V. Cumings (VSB No. 82022)
Cochran & Owen, LLC
8000 Towers Crescent Drive, Suite 160
Vienna, Virginia 22182
(703) 847-4490 [telephone]
(703) 847-4499 [facsimile]
aowen@cochranowen.com
ncumings@cochranowen.com
Counsel for Defendants.